



August 25, 2003

Air Docket,
Environmental Protection Agency
Mailcode:6102T,
1200 Pennsylvania Ave., NW.,
Washington D.C. 20460
Attention: Docket ID No. OAR-2003-0046

Environmental Protection Agency

California Citrus Mutual (CCM) is writing to advise of our support for EPA's proposal to revise the definition of non-road engines to include all diesel-powered engines used in agricultural operations in California that are certified by the engine maker to meet the applicable non-road emission standards. As a way of introduction, CCM is a trade association representing citrus growers throughout California who farm in excess of 110,000 acres.

This is a very valid and necessary rule. The timely application of cultural practices in crop production is absolutely necessary. A grower does not have the luxury of waiting 45 days or more to receive approval to replace an irrigation pump, or wait months for offsets to be provided. A grower should not face criminal prosecution for replacing or repairing an irrigation pump when his entire livelihood is dependent on watering his crop.

Once again, we support this rule as defined that non-road engines are suitable for regulation under Title II of the Federal Clean Air Act.

Cordially,


Shirley Batchman

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